

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Chapter 13
	:	
ROBERT W. LEHMAN	:	2/18/2025 11:00 A.M.
	:	Courtroom #4
	:	
	:	Case No. 24-14061

ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY

1. Admitted.
2. Admitted
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Denied.
10. Denied. Debtors deny that they have failed to make the stated payments as listed and avers that Movant is holding payment(s) in abeyance without crediting their account. However, if debtors have missed after December 2024, they wish to enter into a stipulation allowing them to repay any post-petition arrearages through the remainder of their Chapter 13 plan. Appropriate and allowable pre-petition arrears will be addressed in Debtor's plan.
11. Denied.

12. Denied.
13. Denied.
14. Denied. Debtor will file an amended Plan to address all appropriate arrears.
15. Denied.
16. Denied.
17. Admitted, however, the prior 2 bankruptcy filings were over 15 years ago.
18. Denied.
19. Denied.
20. Denied.
21. Denied.
22. Denied.
23. Denied.
24. Denied.

WHEREFORE, it is requested that this Honorable Court DENY and DISMISS movant's Motion for Relief from the Automatic Stay, or in the alternative approve a stipulation permitting the Debtors to become current on any missed post-petition payments.

Respectfully Submitted,

YOUNG, MARR & ASSOCIATES

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